

10. Paragraph 10 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 10.

11. Paragraph 11 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 11.

12. Paragraph 12 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 12.

13. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 13, and, accordingly, denies the allegations of Paragraph 13.

14. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 14, and, accordingly, denies the allegations of Paragraph 14.

15. Mr. Panther admits the allegations of the first two sentences of Paragraph 15, and denies the allegations of the third sentence.

16. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 16, and, accordingly, denies the allegations of Paragraph 16.

17. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 17, and, accordingly, denies the allegations of Paragraph 17.

18. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 18, and, accordingly, denies the allegations of Paragraph 18.

19. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 19, and, accordingly, denies the allegations of Paragraph 19.

20. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 20, and, accordingly, denies the allegations of Paragraph 20.

21. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 21, and, accordingly, denies the allegations of Paragraph 21.

22. Paragraph 22 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 22.

23. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 23, and, accordingly, denies the allegations of Paragraph 23.

24. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 24, and, accordingly, denies the allegations of Paragraph 24.

25. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 25, and, accordingly, denies the allegations of Paragraph 25.

26. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 26, and, accordingly, denies the allegations of Paragraph 26.

27. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 27, and, accordingly, denies the allegations of Paragraph 27.

28. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 28, and, accordingly, denies the allegations of Paragraph 28.

29. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 29, and, accordingly, denies the allegations of Paragraph 29.

30. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 30, and, accordingly, denies the allegations of Paragraph 30.

31. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 31, and, accordingly, denies the allegations of Paragraph 31.

32. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 32, and, accordingly, denies the allegations of Paragraph 32.

33. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 33, and, accordingly, denies the allegations of Paragraph 33.

34. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 34, and, accordingly, denies the allegations of Paragraph 34.

35. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 35, and, accordingly, denies the allegations of Paragraph 35.

36. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 36, and, accordingly, denies the allegations of Paragraph 36.

37. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 37, and, accordingly, denies the allegations of Paragraph 37.

38. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 38, and, accordingly, denies the allegations of Paragraph 38.

39. Mr. Panther denies the allegations of Paragraph 39.

40. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 40, and, accordingly, denies the allegations of Paragraph 40.

41. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 41, and, accordingly, denies the allegations of Paragraph 41.

42. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 42, and, accordingly, denies the allegations of Paragraph 42.

43. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 43, and, accordingly, denies the allegations of Paragraph 43.

44. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 44, and, accordingly, denies the allegations of Paragraph 44.

45. Mr. Panther denies the allegations of Paragraph 45.

46. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 46, and, accordingly, denies the allegations of Paragraph 46.

47. Mr. Panther denies the allegations of the first sentence of Paragraph 47, admits that he regularly identified himself by his first name James and that he has used the email address james.suqui@strategies.com, but denies the remainder of the allegations of Paragraph 47.

48. Mr. Panther denies the allegations of Paragraph 48.

49. Mr. Panther denies the allegations of Paragraph 49.

50. Mr. Panther denies the allegations of Paragraph 50.

51. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 51, and, accordingly, denies the allegations of Paragraph 51.

52. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 52, and, accordingly, denies the allegations of Paragraph 52.

53. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 53, and, accordingly, denies the allegations of Paragraph 53.

54. Mr. Panther denies the allegations of Paragraph 54.

55. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 55, and, accordingly, denies the allegations of Paragraph 55.

56. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 56, and, accordingly, denies the allegations of Paragraph 56.

57. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 57, and, accordingly, denies the allegations of Paragraph 57.

58. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 58, and, accordingly, denies the allegations of Paragraph 58.

59. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 59, and, accordingly, denies the allegations of Paragraph 59.

60. Mr. Panther denies the allegations of Paragraph 60.

61. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 61, and, accordingly, denies the allegations of Paragraph 61.

62. Mr. Panther denies the allegations of Paragraph 62.

63. Mr. Panther denies the allegations of of the first sentence of Paragraph 63, and lacks knowledge and information sufficient to form a belief as to the remaining allegations of Paragraph 63, and, accordingly, denies the allegations of Paragraph 63.

64. Mr. Panther denies the allegations of the first sentence of Paragraph 64, and lacks knowledge and information sufficient to form a belief as to the remaining allegations of Paragraph 64, and, accordingly, denies the allegations of Paragraph 64.

65. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 65, and, accordingly, denies the allegations of Paragraph 65.

66. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 66, and, accordingly, denies the allegations of Paragraph 66.

67. The first sentence of Paragraph 67 purports to quote a document, which document speaks for itself. With respect to the remaining allegations of Paragraph 67, Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 67, and, accordingly, denies the allegations of Paragraph 67.

68. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 68, and, accordingly, denies the allegations of Paragraph 68.

69. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 69, and, accordingly, denies the allegations of Paragraph 69.

70. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 70, and, accordingly, denies the allegations of Paragraph 70.

71. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 71, and, accordingly, denies the allegations of Paragraph 71.

72. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 72, and, accordingly, denies the allegations of Paragraph 72.

73. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 73, and, accordingly, denies the allegations of Paragraph 73.

74. Mr. Panther denies the allegations in the first sentence of Paragraph 74. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 74, and, accordingly, denies the allegations of Paragraph 74.

75. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 75, and, accordingly, denies the allegations of Paragraph 75.

76. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 76, and, accordingly, denies the allegations of Paragraph 76.

77. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 77, and, accordingly, denies the allegations of Paragraph 77.

78. Mr. Panther admits the allegations in the first sentence of Paragraph 78. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 78, and, accordingly, denies the allegations of Paragraph 78.

79. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 79, and, accordingly, denies the allegations of Paragraph 79.

80. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 80, and, accordingly, denies the allegations of Paragraph 80.

81. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 81, and, accordingly, denies the allegations of Paragraph 81.

82. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 82, and, accordingly, denies the allegations of Paragraph 82.

83. Mr. Panther denies the allegations of Paragraph 83.

84. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 84, and, accordingly, denies the allegations of Paragraph 84.

85. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 85, and, accordingly, denies the allegations of Paragraph 85.

86. Mr. Panther denies the allegations of Paragraph 86.

87. Mr. Panther denies the allegations of Paragraph 87.

88. Mr. Panther denies the allegations of Paragraph 88.

89. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 89, and, accordingly, denies the allegations of Paragraph 89.

90. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 90, and, accordingly, denies the allegations of Paragraph 90.

91. Mr. Panther denies the allegations of Paragraph 91.

92. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 92, and, accordingly, denies the allegations of Paragraph 92.

93. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 93, and, accordingly, denies the allegations of Paragraph 93.

94. Mr. Panther denies the allegations of Paragraph 94.

95. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 95, and, accordingly, denies the allegations of Paragraph 95.

96. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 96, and, accordingly, denies the allegations of Paragraph 96.

97. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 97, and, accordingly, denies the allegations of Paragraph 97.

98. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 98, and, accordingly, denies the allegations of Paragraph 98.

99. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 99, and, accordingly, denies the allegations of Paragraph 99.

100. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 100, and, accordingly, denies the allegations of Paragraph 100.

101. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 101, and, accordingly, denies the allegations of Paragraph 101.

102. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 102, and, accordingly, denies the allegations of Paragraph 102.

103. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 103, and, accordingly, denies the allegations of Paragraph 103.

104. Mr. Panther denies the allegations of Paragraph 104.

105. Mr. Panther denies the allegations of Paragraph 105.

106. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 106, and, accordingly, denies the allegations of Paragraph 106.

107. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 107, and, accordingly, denies the allegations of Paragraph 107.

108. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 108, and, accordingly, denies the allegations of Paragraph 108.

109. Mr. Panther denies the allegations of Paragraph 109.

110. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 110, and, accordingly, denies the allegations of Paragraph 110.

111. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 111, and, accordingly, denies the allegations of Paragraph 111.

112. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 112, and, accordingly, denies the allegations of Paragraph 112.

113. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 113, and, accordingly, denies the allegations of Paragraph 113.

114. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 114, and, accordingly, denies the allegations of Paragraph 114.

115. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 115, and, accordingly, denies the allegations of Paragraph 115.

116. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 116, and, accordingly, denies the allegations of Paragraph 116.

117. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 117, and, accordingly, denies the allegations of Paragraph 117.

118. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 118, and, accordingly, denies the allegations of Paragraph 118.

119. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 119, and, accordingly, denies the allegations of Paragraph 119.

120. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 120, and, accordingly, denies the allegations of Paragraph 120.

121. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 121, and, accordingly, denies the allegations of Paragraph 121.

122. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 122, and, accordingly, denies the allegations of Paragraph 122.

123. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 123, and, accordingly, denies the allegations of Paragraph 123.

124. Mr. Panther denies the allegations of Paragraph 124.

125. Mr. Panther denies the allegations of Paragraph 125.

126. Mr. Panther denies the allegations of Paragraph 126.

127. Mr. Panther denies the allegations of Paragraph 127.

128. Mr. Panther denies the allegations of Paragraph 128.

129. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 129, and, accordingly, denies the allegations of Paragraph 129.

130. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 130, and, accordingly, denies the allegations of Paragraph 130.

131. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 131, and, accordingly, denies the allegations of Paragraph 131.

132. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 132, and, accordingly, denies the allegations of Paragraph 132.

133. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 133, and, accordingly, denies the allegations of Paragraph 133.

134. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 134, and, accordingly, denies the allegations of Paragraph 134.

135. Mr. Panther denies the allegations of Paragraph 135.

136. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 136, and, accordingly, denies the allegations of Paragraph 136.

137. Mr. Panther denies the allegations of Paragraph 137.

138. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 138, and, accordingly, denies the allegations of Paragraph 138.

139. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 139, and, accordingly, denies the allegations of Paragraph 139.

140. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 140, and, accordingly, denies the allegations of Paragraph 140.

141. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 141, and, accordingly, denies the allegations of Paragraph 141.

142. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 142, and, accordingly, denies the allegations of Paragraph 142.

143. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 143, and, accordingly, denies the allegations of Paragraph 143.

144. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 144, and, accordingly, denies the allegations of Paragraph 144.

145. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 145, and, accordingly, denies the allegations of Paragraph 145.

146. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 146, and, accordingly, denies the allegations of Paragraph 146.

147. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 147, and, accordingly, denies the allegations of Paragraph 147.

148. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 148, and, accordingly, denies the allegations of Paragraph 148.

149. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 149, and, accordingly, denies the allegations of Paragraph 149.

150. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 150, and, accordingly, denies the allegations of Paragraph 150.

151. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 151, and, accordingly, denies the allegations of Paragraph 151.

152. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 152, and, accordingly, denies the allegations of Paragraph 152.

153. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 153, and, accordingly, denies the allegations of Paragraph 153.

154. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 154, and, accordingly, denies the allegations of Paragraph 154.

155. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 155, and, accordingly, denies the allegations of Paragraph 155.

156. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 156, and, accordingly, denies the allegations of Paragraph 156.

157. Mr. Panther denies the allegations of Paragraph 157.

158. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 158, and, accordingly, denies the allegations of Paragraph 158.

159. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 159, and, accordingly, denies the allegations of Paragraph 159.

160. Mr. Panther denies the allegations of Paragraph 160.

161. Mr. Panther denies the allegations of Paragraph 161.

162. Mr. Panther lacks knowledge or information sufficient to form a belief as to the allegations of Paragraph 162, and, accordingly, denies the allegations of Paragraph 162.

COUNT ONE

163. Mr. Panther incorporates by reference his answers to the preceding paragraphs.

164. Paragraph 164 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 164.

165. Paragraph 165 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 165.

COUNT TWO

166. Mr. Panther incorporates by reference his answers to the preceding paragraphs.

167. Paragraph 167 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 167.

168. Paragraph 168 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 168.

169. Paragraph 169 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 169.

COUNT THREE

170. Mr. Panther incorporates by reference his answers to the preceding paragraphs.

171. Paragraph 171 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 171.

172. Paragraph 172 states a legal conclusion or theory as to which no response is required; to the extent any further response is needed, Mr. Panther denies the allegations of Paragraph 172.

PRAYER FOR RELIEF

Based on the foregoing, Mr. Panther further denies Plaintiff's entitlement to relief.

AFFIRMATIVE DEFENSES

1. Plaintiff fails to state a claim upon which relief can be granted.
2. Plaintiff's claims are barred by the doctrines of waiver and estoppel.
3. Plaintiff's claims are barred or reduced to the extent any injury was caused by the acts or omissions of third parties for whom Defendants are not responsible.
4. Defendant acted in good faith at all times.
5. Plaintiff's claims are barred by any other matter constituting an avoidance or affirmative defense on legal or equitable grounds. To the extent that Plaintiff failed to set forth its claims with sufficient particularity to permit Defendant to determine all applicable and available defenses, Defendant reserves the right to amend or supplement this Answer and his Affirmative Defenses when, and if, such information is ascertained.

JURY DEMAND

Mr. Panther demands a trial by jury on all claims so triable.

Dated: August 6, 2018

Respectfully Submitted,

SHULMAN, ROGERS, GANDAL,
PORDY & ECKER, P.A.

/s/ Russell D. Duncan
Russell D. Duncan, Esq. (D.C. Bar No. 366888)
12505 Park Potomac Avenue
Sixth Floor
Potomac, Maryland 20854
TEL: (301) 945-9247
FAX: (301) 230-2891
rduncan@shulmanrogers.com
Counsel for Defendant James B. Panther, Jr.
Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2018, I caused a true and correct copy of the foregoing *Defendant James B. Panther, Jr.'s Answer to Plaintiff's Complaint* to be sent via electronic filing to the following:

Duane Thompson
Securities and Exchange Commission
400 F Street, N.E.
Washington, DC 20549
thompsond@sec.gov

/s/ Russell D. Duncan
Russell D. Duncan